**To:** Rodriguez, Dante[Rodriguez.Dante@epa.gov]

**Cc:** Jeryl Gardner[JGARDNER@ndep.nv.gov]; John Batchelder[jbatchelder@envirosolve.com];

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From: Oman, Jack

Sent: Mon 12/14/2015 6:55:56 PM Subject: Yerington Slot Pond operation

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## Dante,

Per our discussions and e-mail exchange, ARC initially proposed to EPA and NDEP that we could either:

1) operate the Slot Pond above its current freeboard, maintain pond levels below the inlet pipe invert and capacity to manage the 25-year/24-hour storm event; and/or 2) transfer fluids from the Slot Pond (likely to the VLT Pond) to continue to operate below the currently designated freeboard.

Based on discussion with BC, who are updating the Goldsim water balance model for the Arimetco FMS, it is ARC's opinion that EPA should allow ARC to operate the Slot Pond as stated above and defer any fluid transfers until BC has completed the update and we discuss those results with you and NDEP. Part of this decision is that preliminary water balance model results indicate that the longevity of the Slot Pond, if operated with a reduced freeboard (i.e., increased maximum operating level), is greater than either the VLT Pond or the two new FMS Evaporation Ponds (B and C Ponds). In addition, the updated model will inform us of the overall approach to operating all of the FMS in an optimum manner, recognizing: 1) the need to maintain capacity for the 25-year/24-hour storm event; and 2) the increasing TDS concentrations and the corresponding increase in the precipitation of mineral salts in the ponds over time.

Therefore, ARC recommends that EPA direct ARC to allow the O&M staff to operate the Slot Pond with a maximum level of 18 feet for the indefinite future. This maximum operating level will contain the drain-down solutions and retain the capacity needed for the 25-year/24-hour storm event. Once we have had a chance to discuss the FMS water balance results, we can determine if this maximum operating level needs to be modified and/or the need for any fluid transfers from the Slot Pond.

The water balance model update should be completed by mid to late January. Please let me know if you have any questions or would like to discuss with the ARC team prior to the completion of the model update.

Thanks,

-jack

## Jack Oman

**Project Manager** 

## **Atlantic Richfield Company**

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